U.S. DISTRICT COURT WESTERN DISTRICT OF LOUISIANA RECEIVED

## UNITED STATES DISTRICT COURT

OCT 1 4 2015

## WESTERN DISTRICT OF LOUISIANA

TONY R. MOORE, CLERK

### LAKE CHARLES DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO: 2: (5 (R00212

\* 18 U.S.C. § 1343

VERSUS

\*

\* JUDGE MINALDI

MELISSA D. CROOKSHANK

\* MAGISTRATE JUDGE KAY

### **INDICTMENT**

#### THE GRAND JURY CHARGES:

#### COUNTS ONE-TEN

WIRE FRAUD 18 U.S.C. § 1343

# A. At all times pertinent to this Indictment:

- The defendant, MELISSA D. CROOKSHANK, was employed from January 2008 until January 14, 2015 as a bookkeeper by persons known to the Grand Jury and identified herein by initials, J.B. and L.B.
- 2. J.B. and L.B. maintained a bank account for their business (a camp hunting lodge account) ending in 1898 as well as a personal account for J.B. ending in 1280 at Iberia Bank located in Lake Charles, Louisiana.
- 3. As bookkeeper, the defendant, MELISSA D. CROOKSHANK, was responsible for keeping the books and paying bills, invoices, and expenses relating to the business account and personal account. She drafted checks

for the owner's signature in payment of subcontractor bills. She also processed the bills and mail for J.B., L.B, and the business. She did not have signatory authority for the bank accounts.

#### B. The Scheme and Artifice to Defraud

Beginning on or about 2009 and continuing through on or about January 14, 2015, in the Western District of Louisiana, and elsewhere, the defendant, MELISSA D. CROOKSHANK, did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud, and to fraudulently obtain money and property by means of false and fraudulent pretenses and representations from J.B. and L.B., the scheme and artifice is more fully described as follows:

- 1. It was part of the scheme and artifice to defraud that the defendant, **MELISSA D. CROOKSHANK,** fraudulently caused checks to be issued totaling \$235,155.79 to her benefit which money she in turn used to support her gambling habit, among other things.
- 2. It was further part of the scheme and artifice to defraud that the defendant, MELISSA D. CROOKSHANK, would staple checks drawn to invoices in apparent payment of the invoice but, in truth and fact, would substitute her name rather than the name or entity reflected on the invoice.

## C. The Charge

On or about the dates specified below, in the Western District of Louisiana, the defendant, MELISSA D. CROOKSHANK, having devised and intending to devise the above-described scheme and artifice to defraud, and to obtain money and property through false and fraudulent representations and pretenses, and for the purpose of executing and attempting to execute the above-described scheme and artifice to defraud, did knowingly transmit or caused to be transmitted by means of wire communication in interstate commerce, certain signals, signs, and sounds as more fully described below:

COUNT	DATE	AMOUNT	TRANSACTION TYPE
1	12/10/2013	\$2,318.40	The defendant caused a check to be drawn to her benefit on the J.B. personal account Check Number: 7083 (Last four account numbers: 1280) located at Iberia Bank, Lake Charles, Louisiana resulting in an electronic signal to FRB Atlanta where the check was electronically cleared.
2	02/20/2014	\$2,649.20	The defendant caused a check to be drawn to her benefit on the J.B. personal account Check Number: 7144 (Last four account numbers: 1280) located at Iberia Bank, Lake Charles, Louisiana resulting in an electronic signal to FRB Atlanta where the check was electronically cleared.
3	03/10/2014	\$3,527.60	The defendant caused a check to be drawn to her benefit on the J.B. personal account Check Number: 7162 (Last four account numbers: 1280) located at Iberia Bank, Lake Charles, Louisiana resulting in an electronic signal to FRB Atlanta where the check was electronically cleared.

4	05/27/2014	\$2,759.60	The defendant caused a check to be drawn to her benefit on the J.B. personal account Check Number: 7243 (Last four account numbers: 1280) located at Iberia Bank, Lake Charles, Louisiana resulting in an electronic signal to FRB Atlanta where the check was electronically cleared.
5	07/22/2014	\$2,939.20	The defendant caused a check to be drawn to her benefit on the J.B. personal account Check Number: 7281 (Last four account numbers: 1280) located at Iberia Bank, Lake Charles, Louisiana resulting in an electronic signal to FRB Atlanta where the check was electronically cleared.
6	10/14/2014	\$3,409.80	The defendant caused a check to be drawn to her benefit on the J.B. personal account Check Number: 7343 (Last four account numbers: 1280) located at Iberia Bank, Lake Charles, Louisiana resulting in an electronic signal to FRB Atlanta where the check was electronically cleared.
7	11/27/2013	\$2,959.20	The defendant caused a check to be drawn to her benefit on the business account Check Number: 6052 (Last four account numbers: 1898) located at Iberia Bank, Lake Charles, Louisiana resulting in an electronic signal to FRB Atlanta where the check was electronically cleared.
8	03/17/2014	\$2,864.40	The defendant caused a check to be drawn to her benefit on the business account Check Number: 6109 (Last four account numbers: 1898) located at Iberia Bank, Lake Charles, Louisiana resulting in an electronic signal to FRB Atlanta where the check was electronically cleared.
9	12/09/2014	\$5,000.00	The defendant caused a check to be drawn to her benefit on the J.B. personal account Check Number: 7343 (Last four account numbers: 1280) located at Iberia Bank, Lake Charles, Louisiana resulting in an electronic signal to FRB Atlanta where the check was electronically cleared.

10	12/19/2014	\$5,000.00	The defendant caused a check to be drawn to
			her benefit on the J.B. personal account Check
		2	Number: 7343 (Last four account numbers:
		18	1280) located at Iberia Bank, Lake Charles,
			Louisiana resulting in an electronic signal to
			FRB Atlanta where the check was
	77		electronically cleared.

All in violation of Title 18, United States Code, Section 1343. [18 U.S.C. § 1343]

A TRUE BILL:

FOREMAN: WEDERAL GRAND JURY

STEPHANIE A. FINLEY United States Attorney

HOWARD C. PARKER, KY Bar: 53660

Assistant United States Attorney 800 Lafayette Street, Suite 2200

Lafayette, Louisiana 70501 Telephone: 337-262-6618